

IN THE UNITED STATES DISTRICT COURT FOR THE  
MIDDLE DISTRICT OF ALABAMA  
SOUTHERN DIVISION

NATALIE ALTINER,	)	
	)	
PLAINTIFF,	)	
	)	
V.	)	CIVIL ACTION NO.:
	)	1:08-cv-00034-WHA-CSC
	)	
FEDEX GROUND PACKAGES,	)	
SYSTEMS, INC.	)	
	)	
DEFENDANT.	)	
	)	

**REPORT OF PARTIES' PLANNING MEETING**

1. Pursuant to Fed.R.Civ.P. 26(f), a meeting of the parties' representatives was held on March 31, 2008, in Birmingham, Alabama, with participation by the following:

- a. Appearing on behalf of Plaintiff: JON C. GOLDFARB.
- b. Appearing on behalf of Defendant: KENNETH D. SANSOM.

2. **Parties**

- a. The plaintiff requests that the Court permit her until **June 18, 2008**, to join any additional parties. Plaintiff requests this amount of time to permit her to at least review the Defendant's responses to her written discovery requests prior to deciding whether to join additional parties. Because this case is on a nine month trial schedule, the Defendant requests that the Plaintiff shall have until **April 30, 2008**, to join any additional parties.
- b. The parties agree that the defendant shall have **30 days after the Plaintiff**, to join any additional parties.

3. **Pleadings**

- a. The plaintiff requests that the Court permit her until **June 18, 2008**,

to join any additional parties. Plaintiff requests this amount of time to permit her to at least review the Defendant's responses to her written discovery requests prior to deciding whether to amend her pleadings. Because this case is on a nine month trial schedule, the Defendant requests that the Plaintiff shall have until **April 30, 2008**, to amend the pleadings.

- b. The parties agree that the defendant shall have **30 days after the Plaintiff**, to amend the pleadings.

4. **Dispositive Motions**

- a. All potentially dispositive motions must be filed by **September 16, 2008**.

5. **Expert testimony**

Unless modified by stipulation of the parties, the disclosure of expert witnesses – including a complete report under Fed.R.Civ.P. 26(a)(2)(B) from any specially retained or employed expert – are due:

- a. From the Plaintiff by **August 1, 2008**.
- b. From the Defendant by **August 31, 2008**.

6. **Discovery Limitations and Cutoffs**

- a. Unless modified by stipulation of the parties.

Depositions:

Maximum of **10** depositions for the plaintiff and **10** depositions for the defendant with a maximum time limit of **7** hours per depositions, unless extended by agreement of the parties.

Interrogatories:

Maximum of **25** for the plaintiff and **25** for the defendant. Responses to all Interrogatories are due **30** days after service.

Request for Admission:

Maximum of **15** for the plaintiff and **15** for the defendant. Responses to all Requests for Admissions are due **30** days after service.

Request for Production:

Maximum of **30** for the plaintiff and **30** for the defendant. Response to all Requests for Production are due **30** days after service.

Supplementation:

Supplements under Rule 26(e), Fed.R.Civ.P. are due as soon as supplements are discovered and no later than **30** days before the close of discovery.

- b. Pre-discovery disclosure: The parties will exchange the information required by Local Rule 26.1(a)(1) by **April 18, 2008**.
- c. Unless modified by court order for good cause shown, all discovery must be commenced in time to be completed by **October 16, 2008**.

7. **Pre-trial conference**

This case is set for pretrial conference on **December 15, 2008**, in Birmingham, Alabama.

8. **Trial**

This case is set for jury trial on **January 12, 2009**, at **9:00 a.m.** in Birmingham, Alabama.

Trial is expected to last **3** days.

9. **Final Lists**

Final lists of trial witnesses and exhibits under Fed.R.Civ.P. 26(a)(3) must be served and filed:

- a. By the plaintiff: **30 days before trial**.
- b. By the defendant: **30 days before trial**.

Objections are to be filed within **10** days after receipt of final lists.

10. **Scheduling Conference**

The parties do not request a scheduling conference prior to the entry of the Scheduling Order.

ATTORNEY FOR PLAINTIFF:

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s/Ethan R. Dettling  
Jon C. Goldfarb  
Ethan R. Dettling  
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